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Attorneys for Defendants, Counterclaimants, and  
Third Party Plaintiffs PCJV USA, LLC, PCI  
TRADING LLC, POTATO CORNER LA  
GROUP, LLC, GK CAPITAL GROUP, LLC,  
NKM CAPITAL GROUP, LLC and GUY  
KOREN, and Defendants J & K AMERICANA,  
LLC, J&K LAKEWOOD, LLC, J&K  
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J  
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,  
HLK MILPITAS, LLC, and GK CERRITOS, LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING , LLC, a  
Delaware limited liability company; GUY  
KOREN, an individual; POTATO CORNER  
LA GROUP, LLC, a California limited  
liability company; NKM CAPITAL GROUP,  
LLC, a California limited liability company;  
J & K AMERICANA, LLC, a California  
limited liability company; J&K  
LAKEWOOD, LLC, a California limited  
liability company; J&K VALLEY FAIR,  
LLC, a California limited liability company;  
J & K ONTARIO, LLC, a California limited  
liability company; HLK MILPITAS, LLC, a  
California, limited liability company; GK  
CERRITOS, LLC, a California, limited  
liability company; J&K PC TRUCKS, LLC,  
a California limited liability company; and,  
GK CAPITAL GROUP, LLC, a California

Case No. 2:24-CV-04546-SB(AGRx)

*Hon. Stanley Blumenfeld, Jr.*

**DECLARATION OF ARASH  
BERAL IN RESPONSE TO DKT.  
NO. 118**

Complaint Filed: May 31, 2024  
Trial Date: August 4, 2025

limited liability company and DOES 1  
through 100, inclusive,

Defendants.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING LLC, a  
Delaware limited liability company;  
POTATO CORNER LA GROUP LLC, a  
California limited liability company; GK  
CAPITAL GROUP, LLC, a California  
limited liability company; NKM CAPITAL  
GROUP LLC, a California limited liability  
company; and GUY KOREN, an individual,

Counter-Claimants,

v.

SHAKEY'S PIZZA ASIA VENTURES,  
INC, a Philippines corporation,

Counter Defendant.

PCJV USA, LLC, a Delaware limited  
liability company; PCI TRADING LLC, a  
Delaware limited liability company;  
POTATO CORNER LA GROUP LLC, a  
California limited liability company; GK  
CAPITAL GROUP, LLC, a California  
limited liability company; NKM CAPITAL  
GROUP LLC, a California limited liability  
company; and GUY KOREN, an individual,

Third Party Plaintiffs,

v.

PC INTERNATIONAL PTE LTD., a  
Singapore business entity; SPAVI  
INTERNATIONAL USA, INC., a California  
corporation; CINCO CORPORATION, a  
Philippines corporation; and ROES 1 through  
10, inclusive,

Third Party Defendants.

**DECLARATION OF ARASH BERL**

I, Arash Berl, declare as follows:

1. I am a partner at Blank Rome LLP, counsel of record for Defendants, Counterclaimants, and Third Party Plaintiffs PCJV USA, LLC, PCI Trading LLC, Potato Corner LA Group, LLC, GK Capital Group, LLC, NKM Capital Group, LLC and Guy Koren, and Defendants J & K Americana, LLC, J&K Lakewood, LLC, J&K Oakridge, LLC, J&K Valley Fair, LLC, J & K Ontario, LLC, J&K PC Trucks, LLC, HLK Milpitas, LLC, and GK Cerritos, LLC. I have personal knowledge of the facts set forth in this declaration, and if called upon to testify under oath, I could and would testify competently thereto.

2. On Tuesday, March 4 at 1:36 pm, the Court issued Dkt. No. 118, its Order on Joint Motion for Attorneys' Fees and Costs (the "Order"). The Order is dated February 28, 2025 and requires Defendants "within 10 days after entry of this order" to "(1) pay to Plaintiff \$5,000 in attorneys' fees and (2) file a declaration confirming that payment has been made." In the context of an ongoing discussion, at 2:10 pm the same day, I emailed Mr. Murphy stating, among other things: "I see that the Court just issued the \$5,000 attorney fee ruling. Kindly provide payment instructions asap."

3. On Thursday morning, March 6, I followed up with Mr. Murphy for payment instructions. I asked if he could send those instructions that day (Thursday). In his responses, Mr. Murphy did not address my request.

4. I am uncertain whether the 10-day deadline is triggered from the date of the Order (February 28, 2025) or from the issuance of the ECF notice (March 4, 2025). If it is the former, then out of an abundance of caution, I am submitting this declaration to the Court today to inform it that Defendants await payment instructions from Mr. Murphy in order to make the \$5,000 payment. I assume Mr. Murphy wants the payment to be made to his new law firm's (Fox Rothschild) trust account, information I do not have to provide to my clients to make the payment.

6. In the event the 10-day deadline was triggered on March 4 instead, I plan to submit a further declaration updating the Court by this Friday, March 14.

10 I declare under penalty of perjury that the foregoing is true and correct.  
11 Executed March 10, 2025, within the United States, its territories, possessions, or  
12 commonwealths.

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 10, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.  
Executed on March 10, 2025.

By: /s/AJ Cruickshank